



## COLUMBIA ENERGY, LLC

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December 12, 2018

*Via Electronic Filing*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WISPA/UTC Request for Waiver of CBRS Transition Deadline; WT  
Docket No. 18-353

Dear Ms. Dortch:

Columbia Energy, LLC is a small service provider that utilizes the 3650-3700 MHz band to provide fixed wireless broadband internet services in Southeast Washington and Northeast Oregon. We currently offer package options with download speeds ranging from 2 Mbps to 10 Mbps to meet the broadband needs of our subscribers, many of whom are in rural areas where there are no other options for reliable broadband access and connectivity. In order to provide these services, Columbia Energy has invested approximately \$100,000 in 3.65 GHz equipment and technology with the expectation that it would be able to upgrade this equipment to operate across the full CBRS band on either a GAA or PAL basis before its current 3.65 GHz license expires. Unfortunately, the process of making the CBRS band broadly available for use has taken longer than anticipated. As a result, Columbia Energy is concerned that there will not be sufficient time for it to transition its 3.65 GHz systems to conform with the new Part 96 CBRS rules before the FCC's five-year transition period ends in April 2020. Columbia Energy therefore strongly supports the request by WISPA and UTC for an extension of the transition deadline for existing 3.65 GHz licensees.

Columbia Energy will need to make significant additional investments to upgrade all of its equipment to operate in the CBRS band, however the company cannot determine the amount that will need to be budgeted until certified equipment (and pricing information) becomes commercially available. As of now, however, equipment certification has only begun, there is no SAS or ESC, and there is still not a certification process for professional installers. Even if all of these necessary steps were to be accomplished in the immediate future, this would give Columbia Energy less than one

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year to obtain CBRS-certified equipment (assuming there is even a sufficient amount of equipment available) and carry out its entire installation before the end of the 2019 construction season. Such a short period of time is unrealistic.

For these reasons, Columbia Energy strongly supports the WISPA and UTC waiver petition and urges the FCC to extend the transition deadline for existing 3.65 GHz licensees to convert their operations to CBRS through January 8, 2023.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Greene", with a stylized, cursive script.

Bob Greene  
Manager of Communications and  
Information Technology  
Columbia Energy, LLC